

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. : _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>RICARDO HEREDIA</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>ISRAEL CASIANO</b>	<b>:</b>	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	<b>:</b>	<b>500 grams or more of cocaine - 1 count)</b>
	<b>:</b>	<b>21 U.S.C. § 841(a)(1), (b)(1)(B) (possession</b>
	<b>:</b>	<b>with intent to distribute 500 grams or</b>
	<b>:</b>	<b>more of cocaine - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about June 17, 2009, to on or about June 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RICARDO HEREDIA and**  
**ISRAEL CASIANO**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 500 grams or more, that is, approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

### **MANNER AND MEANS**

It was a part of the conspiracy that:

2. Defendants ISRAEL CASIANO and RICARDO HEREDIA attempted to sell a kilogram of cocaine for \$33,500 to a cooperating witness ("CW") of the Drug Enforcement Administration ("DEA") in the Philadelphia, Pennsylvania area.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendants ISRAEL CASIANO and RICARDO HEREDIA the following overt acts, among others, were committed in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about June 17, 2009, defendant ISRAEL CASIANO spoke by telephone to the CW to arrange the sale of one kilogram of cocaine for \$33,500 to the CW.

On or about June 18, 2009:

2. Defendant ISRAEL CASIANO met with the CW and an undercover DEA task force officer, who showed \$15,000 to defendant CASIANO as a partial payment for the kilogram of cocaine.

3. Defendant RICARDO HEREDIA delivered to ISRAEL CASIANO a kilogram of cocaine to sell to the CW.

4. Defendants RICARDO HEREDIA and ISRAEL CASIANO arrived in a vehicle at a location to meet the CW and defendant CASIANO exited the vehicle carrying the kilogram of cocaine.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 18, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RICARDO HEREDIA and  
ISRAEL CASIANO**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 500 grams or more, that is, approximately one kilogram, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**MICHAEL L. LEVY**  
**United States Attorney**